

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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UNITED STATES OF AMERICA,	)	
	)	Case No. 17-cr-00134 (WMW-DTS)
	)	
Plaintiff,	)	<b>MOTION TO CONTINUE MOTIONS</b>
	)	<b>RESPONSE FILING DATE AND</b>
v.	)	<b>MOTIONS HEARING AND TO</b>
	)	<b>EXCLUDE TIME UNDER THE</b>
John Kelsey Gammell,	)	<b>SPEEDY TRIAL ACT</b>
	)	
Defendant.	)	
	)	

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The Defendant John Kelsey Gammell, by and through his attorney, hereby respectfully moves the Court for a continuance of the presently set date for the filing of the response to motions currently set for September 1, 2017, and for a continuance of the motions hearing date presently scheduled for September 14, 2017.

The government, counsel, and her client need time to work towards a resolution of issues relating to this case and as such are moving for a continuance.

Further, Defendant John Kelsey Gammell respectfully move the Court to continue trial based on excludable time and to enter finding under 18 U.S.C. § 3161(h)(7)(A) that the ends of justice outweigh the best interests of the Defendant and the public in a speedy trial within the statutory period that would otherwise be required under 18 U.S.C. § 3161, and in support thereof respectfully represents that a signed Statement of Facts will be filed separate from this motion.

The government does not object to this motion.

For the above reasons, the defendant is requesting that the date set date for the filing of the response to defendant's motions currently set for September 1, 2017, be continued to

September 22, 2017, and that the motion hearing date currently scheduled for September 14, 2017, be moved to October 30, 2017, at 10:00 a.m.

For the above reasons, the Defendant is requesting that the presently set dates be continued, which would also continue the trial date.

Dated: August 30, 2017

Respectfully submitted,

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